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ATTORNEYS FOR HEALTHTECH
MANAGEMENT SERVICES, INC.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

POWELL VALLEY HEALTH CARE, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 12-CV-0042-F
)	
HEALTHTECH MANAGEMENT SERVICES, INC.,)	
)	
Defendant/Crossclaimant,)	
)	
v.)	
)	
PAUL CARDWELL and MICHAEL J. PLAKE,)	
)	
Defendants/Cross Defendants.)	

**DEFENDANT/CROSS-CLAIMANT HEALTHTECH'S UNOPPOSED MOTION FOR
ENTRY OF CONSENT JUDGMENT**

Defendant/Cross-Claimant, HealthTech Management Services, Inc., pursuant to Rule 58(d), Fed. R. Civ. P., submits this unopposed motion for the entry of a consent judgment against Michael J. Plake, and states the following in support:

1. HealthTech and Plake have settled HealthTech's claims against Plake, including all claims against Plake which have been scheduled for trial beginning October 15, 2013. HealthTech and Plake have executed a *Settlement Agreement and Claims Release*, attached as Exhibit 1 to this motion ("Settlement Agreement"); Plake executed the Settlement Agreement by the signature of his agent under the authority of the power of attorney attached as Exhibit B to the Settlement Agreement.

2. At pages 2-3 of the Settlement Agreement, Plake agreed to the entry of a Consent Judgment against him in favor of HealthTech in the total amount of \$2,000,000 and also approved a form of Consent Judgment attached as Exhibit A to the Settlement Agreement. In addition, Plake's agent signed Exhibit A to the Settlement Agreement on Plake's behalf, further reflecting Plake's approval of this Consent Judgment. Counsel for HealthTech and Plake have also approved this Consent Judgment, as indicated by their signatures in what is a signed version of Exhibit B to the Settlement Agreement, which is attached as Exhibit 2 to this motion. (Exhibit 2 omits the signature block for Plake but otherwise is identical to Exhibit A to the Settlement Agreement; HealthTech will submit a Word version of Exhibit 2 for the Court's convenience with counsel's signature's represented in the /s/ protocol.)

3. The Consent Judgment establishes the amount of judgment owed by Plake, and does not impose equitable relief or require any future supervision or action by the Court beyond those actions provided for by the Federal Rules of Civil Procedure for the enforcement of any judgment entered by the Court.

4. HealthTech's counsel has obtained the consent of Michael Reese, counsel for Plake, to represent to the Court that this motion is unopposed by Plake and that in fact Plake joins in the motion.

WHEREFORE, HealthTech, together with Plake, respectfully requests that the Court enter the Consent Judgment in the form submitted by the parties with this motion.

DATED: September 27, 2013.

/s/ Bradley T. Cave

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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2013, I served a true and correct copy of the foregoing by CM/ECF addressed to the following:

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